

EXHIBIT “O”

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CAITLIN H. RAILO

MR. CATALINOTTO: Can you clarify whether it's the employer or medical provider?

Q. Did you disclose to Quality Bus -- I'll ask it in two forms -- number one, did you disclose to anyone from Quality Bus that you were taking Suboxone at the time that you were hired by Quality Bus?

A. Yep. Quality Bus or medical?

Q. Quality Bus.

MR. LaROSE: He wants to know, not that whether you told the medical and the medical tells Quality, he wants to know if you directly told somebody at Quality and said I take prescription medication Suboxone.

A. I don't remember.

Q. Do you remember if you told the nurse that you were taking prescription Suboxone?

A. Absolutely.

Q. And did you tell the nurse why you were taking prescription Suboxone?

A. She knows why. There is only one

1 CAITLIN H. RAILO

2 reason to take Suboxone.

3 MR. LaROSE: Okay. So, you didn't
4 tell her specifically?

5 THE WITNESS: No.

6 Q. So --

7 A. I don't think so, no.

8 Q. I don't want to -- I'm trying to
9 understand. I'm trying to understand what
10 you're saying and you're assuming that we all
11 know the reason why you take Suboxone, but I
12 need to know on the record, number one, did you
13 tell the nurse why you were taking Suboxone?

14 A. No.

15 Q. Okay. Is it your position and
16 understanding that you didn't need to tell the
17 nurse why you were taking Suboxone because the
18 nurse would automatically know why you're taking
19 Suboxone?

20 A. Yes.

21 Q. And tell me now why you would take
22 Suboxone.

23 A. It's for people coming off of
24 drugs, any kind of opiates.

25 Q. And what dosage were you taking the

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CAITLIN H. RAILO

doctor and the address that's there,
she's saying that's not her handwriting,
and where it says "no" --

MR. CATALINOTTO: What's not her
handwriting, where it says "doctor"?

THE WITNESS: That's not my
handwriting, I'm sorry, and it says "no
current limitations."

MR. LaROSE: That's not your
handwriting?

THE WITNESS: No. I know why she
didn't put the Suboxone on there. She
told me that she only wanted the
medications that were going to make me
tired on there, and that's the quantity
and the volume, yes.

Q. That's what you recall her telling
you?

A. That's exactly what she told me. I
remember that.

Q. Now, is that your signature
underneath where we're just talking about,
Caitlin Railo?

MR. LaROSE: You mean under Box 1

1 CAITLIN H. RAILO

2 A. PO Q -- it's PO, then QID.

3 Q. Do you know what that stands for?

4 A. QID is twice a day.

5 Q. And then next to that "Diazepam";
6 correct?

7 A. Yes.

8 Q. And Diazepam is Valium; correct?

9 A. Yes.

10 Q. And then there is a dosage after
11 that? Do you see that?

12 A. Yes.

13 Q. Is that the correct -- what is the
14 dosage that's written there?

15 A. 10 milligrams twice a day.

16 Q. Was that accurate? Is that what
17 you're taking at that time?

18 A. Yes.

19 Q. And, again, in this section there
20 is no reference to Suboxone, is there?

21 A. No, because she didn't put it on
22 there.

23 Q. Did you tell her that you were
24 taking Suboxone?

25 A. Yes, I did. She said she only

CAITLIN H. RAILO

watched TV.

Q. Did you take any more medications?

A. No, I don't take my other meds until nighttime. That would only be the blood pressure medication at night.

Q. When do you take your -- let's see, you said that you were taking in the twenty-four-hour period Clonidine, Valium and two Percocets?

A. Yes.

Q. At what time did you take the Clonidine?

A. I don't know. Before work sometime.

Q. It would have been in the morning hours of February 14th?

A. I take it early, probably about 4:00 in the morning.

Q. What about the Valium?

A. Same time. I don't start driving until 7:30.

Q. Do you know if at the time of the accident, whether you were on schedule or were you running late for any reason?

CAITLIN H. RAILO

before the accident?

A. The night before, before I went to sleep.

Q. What time was that?

A. I don't exactly remember. It was 8:00 or 9:00.

Q. 8:00 or 9:00 p.m.?

A. Yes.

Q. What time do you report to the bus garage in the morning?

A. 6:00.

Q. Did you tell anyone when you reported that you had taken Percocet?

A. I don't remember. Like I said, I talked to them that morning.

Q. Did you tell anyone that you took Percocet?

A. I don't remember.

Q. Did anyone ever give you restrictions, that being a doctor or a nurse, in terms of your ability to drive a bus while you were employed by Quality Bus Company?

A. No. My doctor signed off on it.

Q. What doctor was that?

CAITLIN H. RAILO

A. Galli, Dr. Galli, the one that prescribes me my medication.

Q. Who prescribed the Percocet?

A. Koehler, Crystal Run, Crystal Run Health Care.

Q. Did anyone there restrict your ability to drive a school bus or tell you not to drive a school bus when they prescribed the Percocet?

A. No.

Q. Before this motor vehicle accident of February 14th, 2013, did you ever call in sick to work at Quality Bus Company?

A. I don't remember. I think I did.

Q. And how did you do that? Did you stop in? Did you call?

A. Called, I believe. I don't remember.

Q. Do you remember how many times?

A. No.

Q. Was it more than one time?

A. I don't remember.

Q. Did you call yourself or did someone call for you?

CAITLIN H. RAILO

A. No.

Q. And when you signed that, did you list any convictions other than a failure to disobey traffic --

A. That's not my handwriting.

Q. I'm saying, when you signed that, was there anything listed other than the failure to obey a traffic device?

A. No.

Q. That's for convictions; correct? That's under the heading for convictions?

A. Yes.

Q. And by signing that, you certify that the information above is true and accurate, is true and complete?

A. Yes.

Q. You see that?

Do you remember the name of the lady that was in the office right before you did the afternoon run? Do you remember her name?

A. No.

Q. The medications that you were on such as Diazepam, does Diazepam affect your ability to drive?

1 CAITLIN H. RAILO

2 A. No.

3 Q. Does Clonidine affect your ability
4 to drive?

5 A. No.

6 Q. Do you feel that you had any
7 medications in your system at the time of the
8 accident that affected your ability to drive?

9 A. No.

10 Q. Do you remember answering questions
11 last time --

12 A. I'm sorry. Go ahead.

13 Q. -- about that typed statement that
14 we went over?

15 MR. LaROSE: Exhibit J; right?

16 MR. CATALINOTTO: Exhibit J.

17 Q. In that statement they asked you,
18 "Do you regret driving the school bus that day,
19 and you said "Yes." And I believe you testified
20 last time that you regretted that the accident
21 happened, but you were able to drive that day?

22 A. I regret that whole day.

23 Q. I want to make sure I clarified it.

24 When you testified last time, you
25 said you regret that the accident happened, but

1 CAITLIN H. RAILO

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15 MR. LaROSE: Exhibit J; right?

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CAITLIN H. RAILO

when you said I regret it, it didn't mean that
you weren't able to drive that day; is that a
fair categorization?

MR. CIMINI: Objection.

MR. CATALINOTTO: You can answer.

MR. LaROSE: Do you understand what
he is asking?

THE WITNESS: No.

MR. LaROSE: He wants to know what
you meant when you said in this statement
that you regret driving the bus. He
wants to know if -- so, say your question
again?

MR. CATALINOTTO: Yeah.

Q. Last time when you testified --
well, explain to me what you meant.

A. I regret the accident, but...

Q. Correct.

A. I also regret that whole day, I
mean, honestly.

Q. Of course.

A. They should have let me call out.
I'm sorry.

Q. Do you feel you were able to drive

1 CAITLIN H. RAILO

2 a bus that day?

3 A. Mentally, yes, yes. I was
4 uncomfortable.

5 Q. Were you able to drive a bus that
6 day?

7 A. Yes.

8 Q. When you called in the date of the
9 accident, what time was it?

10 A. About 5:30.

11 Q. In the morning?

12 A. (Indicating affirmative response.)

13 Q. You have to say yes or no.

14 A. Yes.

15 Q. What phone did you call from?

16 A. My cell phone.

17 Q. What was the cell number?

18 A. I don't remember.

19 Q. And do you know what the provider
20 was at that time?

21 A. No.

22 Q. And were you at home when you
23 called?

24 A. Yes.

25 Q. Whose name was on that cell phone

CAITLIN H. RAILO

accurate answer.

Q. But do you recall if that's what you said and that's how you answered the question?

A. That might have been what I said to him, yes, but that's only probably one of the sentences with the answer.

Q. And you're right. The following sentence says, "The pill combined with lack of sleep from the night before caused me to be more tired than normal."

A. No, I didn't say that.

Q. You didn't say that?

A. Because I would have been more tired in the morning run than the afternoon run.

Q. Do you have any idea as to why the investigator who took the statement would type the answer that way if that's not what you said?

A. That's why I'm saying, I don't like that whole statement because we were just having conversations about all kinds of drugs and pills and we started going off on this. He was going off on this other tangent about drug dealers and pills, and it was that whole statement is

CAITLIN H. RAILO

BY MR. CATALINOTTO:

Q. Ms. Railo, I'm going to ask you again, was your ability to operate a motor vehicle of any sort impaired at the time of this accident?

A. No.

MR. CATALINOTTO: Thank you.

MR. LaROSE: We're done.

(Time noted - 11:22 a.m.)

oOo

Caitlin H. Railo

Sworn to before me this

_____ day of _____, 2015.

Notary Public